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10 Attorneys for Defendants  
11 AT&T Mobility LLC

12 UNITED STATES DISTRICT COURT  
13 NORTHERN DISTRICT OF CALIFORNIA  
14 SAN JOSE DIVISION

15 In Re Apple & AT&TM  
16 Antitrust Litigation.

Case No. C 07-5152 JW

**SUPPLEMENTAL DECLARATION OF  
CAROLINE MAHONE-GONZALEZ IN  
SUPPORT OF DEFENDANT APPLE'S  
MOTION FOR SUMMARY JUDGMENT  
ON PLAINTIFFS' IPHONE OPERATING  
SYSTEM VERSION 1.1.1 CLAIMS**

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23 PUBLIC REDACTED VERSION  
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1 I, Caroline Mahone-Gonzalez, declare as follows:

2 1. I am employed by AT&T Mobility LLC ("AT&T") in Sacramento,  
3 California. I have worked at AT&T since November 1995. I am currently an Area Manager for  
4 Customer Care and the Office of the President.

5 2. On January 29, 2010, I signed a declaration which was submitted in support  
6 of Defendant Apple's Motion for Summary Judgment on Plaintiffs' iPhone Operating System  
7 Version 1.1.1 Claims. I am submitting this supplemental declaration to address assertions I  
8 understand plaintiffs made in their opposition regarding AT&T's IMEI and SIM Card history  
9 records.

10 3. As I previously explained, [REDACTED]  
11 [REDACTED] These  
12 SIM Card and IMEI history records are automated. Every time a GSM-enabled mobile phone is  
13 turned on, it sends a signal to the wireless network identifying the specific IMEI that is connecting  
14 to the network. [REDACTED]  
15 [REDACTED]  
16 [REDACTED]  
17 [REDACTED]  
18 [REDACTED]

19 4. Mr. Macasaddu's SIM Card and IMEI history records were included within  
20 the data attached as Exhibit B to my January 29, 2010 declaration ("Exhibit B"). Exhibit B  
21 reflected SIM card and IMEI history records for the phone number [REDACTED] throughout the  
22 period 3/29/06 – 10/1/09 no matter to whom the number was assigned. Thus, Exhibit B reflects  
23 SIM card and IMEI history associated with the [REDACTED] number both before and after Mr.  
24 Macasaddu's line was canceled. This is because wireless numbers are often reassigned after they  
25 are cancelled. Mr. Macasaddu's number ([REDACTED]) was canceled effective 2/9/09 and was  
26 reassigned twice. It was first reassigned and belonged to an individual other than Mr. Macassadu  
27 on a prepaid line from 5/5/09 until 9/11/09. On 9/24/09, it was reassigned again and was (and still  
28 is) assigned to a company. The SIM card and IMEI history relating to the [REDACTED] number

1 occurring after 2/9/09 in Exhibit B belonged to those other AT&T account holders and not Mr.  
2 Macasaddu.

3 I declare under penalty of perjury, and consistent with the provisions of 28 U.S.C.  
4 § 1746, that the foregoing is true and correct.

5 Executed in Sacramento, California  
6 this 31<sup>st</sup> day of March, 2010.

  
Caroline Mahone-Gonzalez